

**Response of
Wisconsin Power and Light Company
to
The Public Service Commission of Wisconsin
Data Request No. 3.22**

Docket Number: 05-CE-137
Date of Request: March 11, 2009
Information Requested By: Ken Detmer
Date Responded: March 23, 2009
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Witness: (If other than Author)

Data Request No. 3.22:

Provide updated EGEAS analysis without NED 3 and consideration of the other changes discussed during the latest technical discussion between staff and WP&L modeling experts.

Response:

Data Request Response No. 3.22 Attachment A provides a table that summarizes the results of updated EGEAS analyses. Data Request Response No. 3.22 Attachment B outlines the planning alternatives included in the EGEAS analyses. Data Request Response No. 3.22 Attachment C (**CONFIDENTIAL**) is a CD, which is being delivered to the PSCW today, containing the electronic files of the EGEAS analyses.

WPL will run and provide several additional sensitivities regarding the renewal of the Kewaunee PPA.

**Wisconsin Power and Light Response to Public Service Commission of Wisconsin Staff Data Request No. 3.22 Attachment A Updated Analysis
Present Value of the Revenue Requirements**

| | | Future Scenarios* | | | | | |
|-------|--|---|--|---|--|--|---|
| | | Future 1 Base Assumptions No Monetized CO2 Allowances SO2 and NOX cost levels at new forecasted levels | Future 2 Base Assumptions and Monetized CO2 Allowances -Based upon Staff's NED 3 CO2 ramp approach (\$10/ton beginning in 2015, ramping to \$25/ton in 2025 (2008 dollars)) -Nuclear Available after 2020. -SO2 and NOX cost levels at new forecasted levels | Future 3 High Retention Value -Gas prices high -Coal prices Low -Purchase power market prices consistent with gas prices -SO2 and NOX cost levels at new forecasted levels -Project costs are 10% below the estimate -Nuclear Available after 2020 | Future 4 Low Retention Value -Gas prices low -Coal prices high -Purchase power market prices consistent with gas prices -SO2 and NOX cost levels at new forecasted levels -Project costs are 20% above the estimate -Nuclear Available after 2020 | Future #5 Carbon Constrained Future A Beginning with CO2 Monetization in 2015: -CO2 Monetized at Future 2 levels -Gas prices high, corresponding with CO2 monetization -Coal prices low, corresponding with CO2 monetization -Purchase power market prices consistent with gas and coal prices -SO2 and NOX cost levels at new forecasted levels -Demand and energy forecast at base levels -Nuclear Available after 2020 -Policy changes consistent with carbon constrained environment: -Elimination of the wind PTC corresponding with CO2 monetization -25% RPS by 2025 (2%/yr 2015 to 2020; 1%/yr 2020 to 2025) | Future #6 Carbon Constrained Future B (consistent with WEPCO response to DR KD-2, 6630-CE-302) Beginning with CO2 Monetization in 2015: -CO2 Monetized at Future 2 levels -Gas prices high, corresponding with CO2 monetization -Coal prices low, corresponding with CO2 monetization -Purchase power market prices consistent with gas and coal prices -SO2 and NOX cost levels at new forecasted levels -Demand and energy forecast at base levels -Nuclear Available after 2020 -Policy changes consistent with carbon constrained environment: -Elimination of the wind PTC corresponding with CO2 monetization -25% RPS by 2025 (2%/yr 2015 to 2020; 1%/yr 2020 to 2025) |
| Plans | Plan 1: Install SCR in 2011 | \$14,553.8 M B08_2045_RETIRE_5E2C | \$17,189.2 M B0845_5E2_P1F2G | \$14,966.3 M B0845_5E2_P1F3C | \$15,289.9 M B0845_5E2_P1F4H | \$18,026.7 M B0845_5E2_P1F5D | \$15,976.2 M B0845_5E2_P1F6D |
| | Plan 2: Do not install SCR and retire Edgewater Unit 5 at the end of 2012 | \$15,100.5 M B08_2012_RETIRE_5E2C | \$17,510.8 M B0812_5E2_P2F2C | \$15,633.7 M B0812_5E2_P2F3C | \$15,636.6 M B0812_5E2_P2F4F | \$18,597.5 M B0812_5E2_P2F5C | \$16,355.4 M B0812_5E2_P2F6C |
| | Plan 3: Install SCR in 2011 and Bag House and Scrubber in 2014 | \$14,847.6 M B08_2045_RETIRE_5E2_BHC | \$17,478.1 M B08BH_5E2_P3F2C | \$15,240.4 M B08BH_5E2_P3F3C | \$15,616.9 M B08BH_5E2_P3F4D | \$18,303.0 M B08BH_5E2_P3F5C | \$16,255.0 M B08BH_5E2_P3F6C |

* PVRR values stated in table cells are in millions of 2008 dollars, discounted present value, with a 35 year extension.

| Data Request No. 3.22 Attachment B Status of Planning Alternatives In the Edgewater Unit 5 SCR Updated EGEAS model | | |
|---|---|--|
| EGEAS Planning Alternative Number | Included as a Planning Alternative | EGEAS Planning Alternative Name |
| 1 | Yes | New CT 155MW |
| 2 | Yes | NEW JOU CC 300MW |
| 5 | Yes | COL4 SUP 60% JOU |
| 6 | Yes | GREENF PC 50% JOU |
| 9 | Yes | IGCC GEQU 60% JOU |
| 11 | Yes | NEWBIOMASS 300 MW |
| 12 | Yes | PEAK PUR 1-YEAR |
| 21 | Yes | BENT TREE WIND |
| 24 | Yes | DSM UR-116 |
| 26 | Yes | DSM AMI |
| 27 | Yes | RPS35 WIND 100MW |
| 28 | Yes | NEW CC 264MW |
| 29 | Yes | RPS38 WIND 100MW |
| 30 | Yes | NucAP1000J GF |
| | | |
| 3 | No | NED3 CFB 326 MW |
| 4 | No | COL3 SUB 300 MW |
| 7 | No | GREENF SUB 300 MW |
| 8 | No | GREENF AFB 300 MW |
| 10 | No | IGCC SHEL 60% JOU |
| 13 | No | WISC WIND 100MW |
| 14 | No | IA NM WIND 100MW |
| 15 | No | DSM SHARE SAVGS |
| 16 | No | DSM BUS EN FOCUS |
| 17 | No | DSM RES EN FOCUS |
| 18 | No | DSM DLC PROGRAM |
| 19 | No | IA PPA WIND 2009 |
| 20 | No | IA PPA WIND 2010 |
| 22 | No | BASE 350 ECONOMY |
| 23 | No | OTHR 450 ECONOMY |
| 25 | No | DSM HIGH LEVEL |